

# Northwest Telephone Cooperative Association

844 Wood Street  
Havelock, IA 50546

800.247.2776

P 712.776.2222

F 712.776.4444

www.northwest.coop

www.ncn.net

## Annual 47 C.F.R. § 64.2009(e) CPNI Certification EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2008

Date filed: 2/11/09

Name of company covered by this certification: Northwest Telephone Cooperative Association  
Form 499 Filer ID: 804612

Name of signatory: Donald D Miller

Title of signatory: Chief Executive Officer

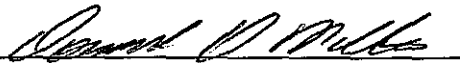
I, Donald D Miller certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company Northwest Telephone Cooperative Association is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Signed



Donald D Miller, CEO

Northwest Telephone Cooperative Association

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## Customer Proprietary Network Information (CPNI) Documentation of Operating Procedures

For

Northwest Telephone Cooperative Association  
844 Wood Street  
Havelock, IA 50546

1. CPNI rules are reviewed on a regular basis with employees. Employees with access to CPNI have been trained on when they are, and are not, authorized to use CPNI.
  - a. Required CPNI training for all employees was held on October 18 and 19<sup>th</sup>, 2007 at Northwest Telephone Cooperative Association office. Consortia Consulting presenter.
  - b. Additional CPNI training on October 30, 2007 at Northwest Telephone Cooperative Association Employee Meeting. Reviewed policies and letters to be sent to customer. All employees were required to sign the Employee Acknowledgement of CPNI. Any employee who refused to sign the acknowledgement would have been immediately terminated.
  - c. New employees receive CPNI training during new employee orientation and are required to sign the Employee Acknowledgement at that time.
  - d. All employees will receive annual CPNI training.
2. Company does not provide CPNI to third parties.
3. Company has a defined disciplinary process in place for violations and for improper use of any customer information, including CPNI.
  - a. Policies are included.
4. Currently, our company markets a product or service to its entire customer base or it uses the "total service approach" which allows it to use CPNI to market offerings related to the customer's existing service to which the customer currently subscribes.
5. If, in the future, the company wants to use CPNI to market outside of the total service approach, a process will be developed that meets the requirements of §64.2007 and §64.2008.

At the same time a process will be established for noting customer's accounts when notification is given, noting the approval/denial status on each customer account and ensuring that the status of a customer's CPNI approval will be prominently displayed as soon as the customer's account is accessed.

The company will also establish a supervisory review process for any outbound marketing campaigns.

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6. Northwest Telephone Cooperative Association sent CPNI information to all of its telephone customers assigning a PIN number so that each account holder could be authenticated prior to establishing a password. Once the account holders were authenticated, they were given the opportunity to set up a password and a backup authentication response. For those customers that did not set up a password, the customer service representative calls the customer back at the number of record, mails the requested information to the address of record, or asks the customer to come into the office with a valid photo ID.
7. The company has established a process for promptly notifying customers whenever a change is made to any of the following:
  - Password
  - Customer response to a back-up means of authentication for a password
  - Address of record
  - On-line account

The notification to the customer will be made either by a company-originated voicemail or text message to the telephone number of record or sent to the address (postal or electronic) of record.

The company has a process within its billing software for tracking when a notification is required and for recording when and how the notification is made to the customer.

8. The company will provide notification whenever a breach (a person, without authorization or exceeding authorization, has intentionally gained access to, used, or disclosed CPNI) as follows:
  - Notify the United States Secret Service (USSS) and the Federal Bureau of Investigation (FBI) as soon as practicable, but in no event later than 7 business days after determination of the breach. The notification will be via the FCC link at <http://www.fcc.gov/eb/cpni>
  - Notify customers only after 7 full business days have passed since notification to the USSS and the FBI, unless either has requested an extension.
  - If there is an urgent need to notify affected customers or the public sooner to avoid immediate and irreparable harm it will be done only after consultation with the relevant investigating agency.
  - Maintain a detailed record of the breach with all of the required information as defined in § 64.2011.
  - Include a summary of the breach in the annual compliance certificate filed with the FCC.
9. The company retains all information related to the CPNI rules for a minimum period of two years with the exception of the Annual Certification which is maintained for at least five years.
10. The company's CPNI policies include reasonable measures to discover and protect against activity that is indicative of pretexting and employees are instructed to notify the General Manager if any such activity is suspected.
11. The company has assigned Donald D Miller, CEO of Northwest Telephone Cooperative Association as the CPNI Compliance Officer.

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712-776-2222 ♦ 800-247-2776 ♦ 712-776-4444 (fax) ♦ www.northwest.coop ♦ nis@ncn.net

Employee Policy 48

## **Northwest Telephone Cooperative Association** **Customer Proprietary Network Information (CPNI) Acknowledgement**

On an annual basis an officer of our company must certify that it has established procedures that are adequate to ensure compliance with the FCC's Customer Proprietary Network Information (CPNI) rules and that the rules have been reviewed with employees, especially those that have access to CPNI.

Attached is a summary of the CPNI rules for your review. With regard to the rules, please note that our company has not obtained customer approval to use CPNI in our marketing plans because we market to all customers without using CPNI.

Any questions you have regarding the rules should be referred to Customer Service Supervisor.

*Once you have reviewed the rules, please sign and date the following:*

I have reviewed and understand the CPNI rules and the company's policy for compliance with the rules. I also understand that inappropriate use of CPNI will result in disciplinary action by my employer. Please refer to the Northwest Telephone Employee Handbook, Policy #25—Disciplinary System and Employee Policy #31—Confidentiality.

Employee Printed Name: \_\_\_\_\_

Employee Signature: \_\_\_\_\_

Date: \_\_\_\_\_

January 29, 2007  
Approved Date

Vern Smith  
President, Vern Smith

### **DISCIPLINARY SYSTEM**

Northwest Telephone Cooperative Association encourages each employee to develop his/her performance to the highest level. To achieve this level an employee cannot let lateness, and absenteeism failure to follow work rules and policies or unacceptable job performance interfere with his/her job.

When a problem occurs the employee generally will be directed to change the unacceptable behavior or performance problem. The disciplinary process includes, but it not limited to, the following steps:

#### **VERBAL WARNING AND COUNSELING:**

If the immediate department manager or the General Manager views your behavior or performance on the job as unacceptable he/she will counsel you regarding the problem area.

#### **WRITTEN WARNING AND COUNSELING:**

If the unacceptable behavior or performance continues after counseling, your department manager or the General Manager will document the behavioral or performance problem, previous discussions, the current situation and conditions regarding necessary improvements. You will receive a copy of the memo and a copy will be retained in your employee file. Continuation of the unacceptable behavior or performance after verbal and/or written warning WILL BE CAUSE FOR SUSPENSION AND/OR TERMINATION.

#### **SUSPENSION:**

If the nature and level of severity of the problem warrant such a step, you may be suspended for a period not to exceed five (5) working days. You will not be paid during the suspension period, and documentation of the suspension will be placed in your employee file. In the suspension discussion, your department manager or the General Manager will explain to you why you are being suspended. The existence of this suspension option shall not imply that suspension will always occur. If the nature and severity of the problem warrant such an action, you will be terminated. This policy applies only to non-exempt personnel. It does not apply to managerial staff

July 14, 1997  
Approved Date

Roger Kerns (signature on file)  
President

**TERMINATION:**

In the event of a serious problem or when all measures of progressive disciplinary action regarding behavioral or performance problems have been taken and there is insufficient improvement, employment will be terminated.

**THE STEPS TAKEN AND TIME ALLOWED FOR RESOLUTION IS DEPENDENT UPON THE NATURE AND SEVERITY OF THE PROBLEM. NORTHWEST RESERVES THE RIGHT IN ITS SOLE DISCRETION TO REVISE OR IMPLEMENT ANY PORTION OF THIS POLICY AT ANY TIME. THE ORDER OF AND DISCIPLINARY STEPS TAKEN ARE DETERMINED BY NORTHWEST. ALL EMPLOYEES ARE AT WILL AND MAY BE TERMINATED AT ANY TIME WITHOUT CAUSE OR NOTICE.**

**TERMINATION OF EMPLOYMENT**

**All employees are employees at will. Employment with Northwest Telephone Cooperative Association can be terminated with or without cause and with or without notice by either the employee or the employer. However, we would like to encourage you to give two weeks notice prior to voluntary termination. The Northwest will make severance arrangements on an individual basis, if management in its sole discretion deems it appropriate. All employees are expected to turn in all Northwest Telephone Cooperative keys, uniforms, and any other property of the Cooperative upon termination.**

July 14, 1997  
Approved Date

Roger Kerns (signature on file)  
President

NORTHWEST TELEPHONE COOPERATIVE ASSOCIATION

844 Wood Street PO Box 186 Havelock LA 50546-0186

Donald D. Miller, General Manager

**Employee Policy 31**

**CONFIDENTIALITY**

All information about Northwest Telephone Cooperative Association and its subsidiaries or affiliates, which has not been made available to the public by the Association, is considered to be proprietary and confidential information. Proprietary and confidential information includes, but is not limited to, compilations and lists of customer names and addresses, documents relating to pricing policies and other customer services, methods of operations, sales and marketing plans, scripts, product lists, price lists, benefit plans and salary information.

Confidential and proprietary information also includes all information relating to the computer system, operation of the system, security system, security functioning, passwords, codes, and similar information.

Any employee releasing, appropriating, or misusing confidential and proprietary information, will be subject to discipline up to and including termination as well as potential legal action.

I, \_\_\_\_\_, hereby state that I have read or have had the confidentiality policy read to me and that I understand its contents.

\_\_\_\_\_  
Date

\_\_\_\_\_  
Employee Signature

July 14, 1997  
Approved Date

Roger Kerns (signature on file)  
President